

Writer's Direct Dial Number: (850) 521-1706 Writer's E-Mail Address: bkeating@gunster.com

August 12, 2016

BY ELECTRONIC FILING

Ms. Carlotta Stauffer, Clerk Florida Public Service Commission 2540 Shumard Oak Boulevard Tallahassee, FL 32399-0850

Re: Docket No. 160074-EQ: Petition for approval of new standard offer rate schedule for energy purchases from cogenerators and renewable facilities and for approval of standard offer contract for purchased of firm capacity and energy, by Florida Public Utilities Company.

Dear Ms. Stauffer:

Attached for electronic filing, please find Florida Public Utilities Company's responses to Staff's First and Second Sets of Data Requests in the referenced docket.

As always, thank you for your assistance in connection with this filing. If you have any questions whatsoever, please do not hesitate to let me know.

Sincerely,

Beth Keating

Gunster, Yoakley & Stewart, P.A. 215 South Monroe St., Suite 601

Tallahassee, FL 32301

(850) 521-1706

Docket No. 160074-EQ – Petition for approval of new standard offer rate schedule for energy purchases from cogenerators and renewable facilities and for approval of standard offer contract for purchased of firm capacity and energy, by Florida Public Utilities Company.

Florida Public Utilities Company's Responses to Staff's First Set of Data Requests

Florida Public Utilities Company's ("FPUC") responses to Staff's First Data Requests are as follows:

1. Please complete the following tables describing payments to a renewable provider based on the proposed tariffs included in FPUC's revised standard offer contract. Please assume a renewable generator with a 50 MW output providing firm capacity with an in-service date of January 1, 2017, operating at the minimum capacity factor required for full capacity payments and a contract duration of 20 years. Please state the capacity factor assumed for the calculations. Please provide an Excel spreadsheet in support of the calculation, and provide the total Net Present Value (NPV) of all payments in 2017 dollars, with an explanation of the method and rate used to calculate the NPV.

Company Response:

Please see FPUC's responses to Staff's Third Data Request for Docket No. 160074-EQ, Questions 5 and 6 for the information requested in A and B below. Due to the nature of our wholesale power contracts the calculations for information requested in C, D and E are not available and have not been provided in previous standard offer contact filings.

Please provide the completed table for the following five scenarios:

- A. As-available energy (energy only payments)
- B. Normal capacity payments
- C. Levelized payments
- D. Early payments
- E. Early levelized payments

Year	Energy	Capacity Rate	Total Capacity Payments	Energy Rate	Total Energy Payments	Total Payments
	(MWh)	(\$/kw- mo)	(\$)	(\$/MWh)	(\$)	(\$)
2017					·	
2018						
2019						
2020						

2021			
2022			
2023			
2024			
2025			
2026			
2027			
2028			
2029			
2030			
2031			
2032			
2033			
2034			
2035			
2036			
Total			
(nominal)			
Total NPV			
(\$2017)			

Docket No. 160074-EQ — Petition for approval of new standard offer rate schedule for energy purchases from cogenerators and renewable facilities and for approval of standard offer contract for purchased of firm capacity and energy, by Florida Public Utilities Company.

Florida Public Utilities Company's Responses to Staff's Second Set of Data Requests

Florida Public Utilities Company's ("FPUC") responses to Staff's Second Data Requests are as follows:

- 1. Please complete the following tables describing payments to a renewable provider based on the company's existing tariffs and the proposed tariffs in the company's filing. Please assume a renewable generator with a 50 MW output providing firm capacity with an in-service date of January 1, 2017, operating at the minimum capacity factor required for full capacity payments and a contract duration of 20 years. Please state the capacity factor assumed for the calculations. Please provide an Excel spreadsheet in support of the calculation, including the total Net Present value (NPV) of all payments in 2017 dollars, with an explanation of the methodology and rate used to calculate the NPV. Please provide the completed tables for each of the following scenarios:
 - a. For the Northeast Division, under the company's existing tariffs.

Company Response:

Please see FPUC's Response to Staff's Third Data Request for Docket No. 160074-EQ, Questions 5A. Due to the nature of our wholesale power contracts the information for Levelized, Early and Early Levelized Capacity Payments are not available and have not been provided in previous standard offer contact filings.

b. For the Northeast Division, under the proposed tariffs included in the company's petition, based on the avoided cost of the current full requirements supplier (JEA).

Company Response:

Please see FPUC's Response to Staff's Third Data Request for Docket No. 160074-EQ, Questions 5A. Due to the nature of our wholesale power contracts the information for Levelized, Early and Early Levelized Capacity Payments are not available and have not been provided in previous standard offer contact filings.

c. For the Northwest Division under the company's existing tariffs.

Company Response:

Please see FPUC's Response to Staff's Third Data Request for Docket No. 160074-EQ, Questions 5A. Due to the nature of our wholesale power

- contracts the information for Levelized, Early and Early Levelized Capacity Payments are not available and have not been provided in previous standard offer contact filings.
- d. For the Northwest Division under the proposed tariffs included in the company's petition, based on the avoided cost of the current full requirements supplier (Gulf Power Company).

Company Response:

Please see FPUC's Response to Staff's Third Data Request for Docket No. 160074-EQ, Questions 5A. Due to the nature of our wholesale power contracts the information for Levelized, Early and Early Levelized Capacity Payments are not available and have not been provided in previous standard offer contact filings.

	En	Capacity Payment (By Type)				
Year	ergy Pa	N ormal	Le velized	E arly	Ea rly	
	\$(0	\$	\$(0	\$	\$(0	
2017						
2018						
2019						
2020						
2021						
2022						
2023						
2024						
2025					12.00	
2026						
2027						
2028						
2029						
2030						
2031						
2032						
2033						
2034						
2035						
2036						
Total						
NPV						

2. Please provide copies of the new tariff proposed by FPUC. Use the avoided cost of FPUC's underlying full requirement suppliers as the basis for the calculation of payments. Please explain the authority and the availability of such avoided cost information for FPUC's current full requirement suppliers. As part of this response, please provide copies of Gulf Power Company's Rate Schedule COG-1 and JEA's Renewable Standard Offer Contract.

Company Response:

Please see FPUC's Response to Staff's Third Data Request for Docket No. 160074-EQ, Question #2 for the JEA and Gulf Power Company standard offer contracts. Refer to Staff's Third Data Request for Docket #160074-EQ, Question 5A which outlines the payment method and resulting customer impact to providers outside of the FPUC service territory.

3. Please explain any effect to the capacity payment due to changes in the new tariff, including the use of the avoided cost of FPUC's underlying full requirement suppliers as the basis for the calculation of payments in the proposed schedule of the new tariff.

Company Response:

The capacity payments will not change based on the new tariff. Please see FPUC's Response to Staff's Third Data Request for Docket No. 160074-EQ, Question 4 which provides a response to this question.

4. Please explain any effect to the energy payment due to changes in the new tariff, including the updated language in Sheet No. 18, Sheet No. 24, and Sheet No. 25 to address line losses and purchase-related cost reductions.

Company Response:

The energy payments will change based on the new tariff and will be further differentiated by the location of the provider (i.e. within the FPUC electric service territory or outside the FPUC electric service territory). Please see FPUC's Response to Staff's Third Data Request for Docket No. 160074-EQ, Question 5 which addresses providers outside the FPUC electric service territory and Question 6 which addresses providers within the FPUC electric service territory.